

RICHARD J. TROBERMAN, P.S.
 Attorney at Law
 WSBA No. 6379
 520 Pike Street, Suite 2500
 Seattle, WA 98101-1385
 Telephone: (206) 343-1111
 Facsimile: (206) 340-1936
 E-Mail: tmanlaw@aol.com

Attorney for Defendant
 Adam Benjamin Goldring

**UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF WASHINGTON**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
 vs.)
)
 ADAM BENJAMIN GOLDRING,)
)
Defendant.)

No. 4:15-cr-6049-EFS-12

**RESPONSE TO DEFENDANT
 CASILLAS'S MOTION TO
 CONTINUE TRIAL DATE AND
 TO EXTEND TIME FOR FILING**

Richland, 08/29/2017 10:00 a.m.

On August 10, 2017, Defendant Jese David Carillo Casillas filed a Motion to Continue Trial Date and to Extend Time for Filing. Dkt. #494. The Motion provides, *inter alia*, that "At this time, Mr. Troberman has indicated on behalf of Mr. Goldring (12) that he has no objection." Motion, at 5. Mr. Goldring files this Response to Defendant Casillas's motion in order to clarify that his lack of objection to a continuance was, and is, qualified depending on

**RESPONSE TO DEFENDANT CASILLAS'S
 MOTION TO CONTINUE TRIAL DATE AND
 TO EXTEND TIME FOR FILING;
 Case No. 4:15-CR-6049-EJS - 1**

RICHARD J. TROBERMAN, P.S.
 ATTORNEY AT LAW
 520 PIKE STREET, SUITE 2500
 SEATTLE, WASHINGTON 98101-1385
 (206) 343-1111

1 the length of the continuance, and the new date.

2 Prior to filing her motion on behalf of Defendant Casillas, Ms. Emmans
3 solicited input from other defense counsel on her proposed motion. In my
4 response to her inquiry, I advised Ms. Emmans that while Mr. Goldring has no
5 objection to a continuance of the November trial date, I will be out of the
6 country from March 1-12, 2018, and that any new trial date would need to
7 commence sufficiently in advance of March 1 to allow time for completion of
8 the trial by February 28, 2018, or would need to commence no earlier than
9 March 26, 2018. See email to Robin Emmans (and all counsel), dated August
10 10, 2017, a copy of which is attached hereto as Exhibit A.

11 I will not be present at the August 29, 2017, Status Conference, and Mr.
12 Goldring will be represented at that hearing by Stand-In counsel.¹ Mr.
13 Goldring's lack of objection to a continuance of the November trial date is
14 contingent on the Court setting a new trial date that would result in completion
15 of the trial by February 28, 2018, or would not commence until after March
16 26, 2018. In any event, Mr. Goldring would not consent to a continuance of
17 more than six (6) months at this time.

18 ¹
19 Pursuant to the Court's instructions at the Status Conference on July 10, 2017, Mr.
20 Goldring will file a written Consent to Proceed with Stand-In Counsel prior to the hearing.

1 DATED this 11 day of August, 2017.

2 RICHARD J. TROBERMAN, P.S.

3
4 By: 

5 RICHARD J. TROBERMAN

6 WSBA #6379

7 Attorney for Defendant

8 Adam Benjamin Goldring

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
**RESPONSE TO DEFENDANT CASILLAS'S
MOTION TO CONTINUE TRIAL DATE AND
TO EXTEND TIME FOR FILING;
Case No. 4:15-CR-6049-EJS - 3**

RICHARD J. TROBERMAN, P.S.
ATTORNEY AT LAW
520 PIKE STREET, SUITE 2500
SEATTLE, WASHINGTON 98101-1385
(206) 343-1111

Subj: **Re: U.S. v. Defendants, et al**
Date: 8/10/2017 10:49:10 A.M. Pacific Daylight Time
From: TMANLAW@aol.com
To: robin.emmans@secondstreetlaw.com, rick_hoffman@fd.org, maria_deleon@fd.org, Jennifer_McCann@fd.org,
laureen@eganslaw.com, hlooffice@Basinis.com, hlooffice1039@gmail.com, rasmith@house314.com,
smithone@house314.com, 2lawyers@owt.com, scott@johnsonorr.com, troylee@qwestoffice.net,
vh_lara@hotmail.com, ledmond.esq@gmail.com, adam@pechtellaw.com, office@eganslaw.com,
gregory@scottlaw.net, keila.scott@scottlaw.net, jgregorylockwood@hotmail.com, kentherrien@msn.com,
martha.ktlaw@outlook.com, Martin_Zepeda@fd.org, Cary@btg-litsupport.com, Daley@btg-litsupport.com,
rvw@ettertermcmahon.com, mwlynch@yvn.com

Robin, I represent Adam Goldring. We have no objection to a continuance of the November trial date. However, I will be out of the country from March 1-12, 2018. So the new trial date would have to begin either sufficiently in advance of March 1 to allow enough time to complete the trial by February 28, or commence at least two weeks after I return on March 12.

Richard J. Troberman, P.S.
Attorney at Law
520 Pike Street, Suite 2500
Seattle, WA 98101-1385
Telephone: (206) 343-1111
Facsimile: (206) 340-1936
Email: tmanlaw@aol.com

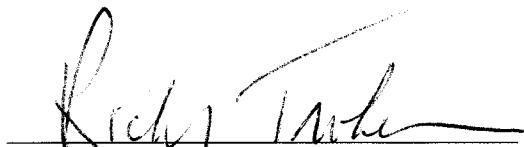
PLEASE NOTE: THIS IS A PRIVILEGED AND CONFIDENTIAL COMMUNICATION INTENDED ONLY FOR THE DESIGNATED RECIPIENT.

This email is covered by the Electronic Communications Privacy Act, 18 USC 2510-2521, and is legally privileged. The contents of this email and its attachments, if any, are confidential, and are intended solely for the addressee(s) hereof. In addition, this email transmission may be subject to privilege protecting communications between attorneys and their clients. If you are not the named addressee, or if this message has been addressed to you in error, you are directed not to read, disclose, reproduce, distribute, disseminate, or otherwise use this transmission. Delivery of this message to any person other than the intended recipient(s) is not intended in any way to waive privilege or confidentiality. If you have received this transmission in error, please alert the sender by reply email. We also request that you immediately delete this message and attachments, if any. Thank you.

EXHIBIT A

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2017, I electronically filed the foregoing "RESPONSE TO DEFENDANT CASILLAS'S MOTION TO CONTINUE TRIAL AND TO EXTEND TIME FOR FILING" with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorneys of record in this case.


RICHARD J. TROBERMAN

RESPONSE TO DEFENDANT CASILLAS'S
MOTION TO CONTINUE TRIAL DATE AND
TO EXTEND TIME FOR FILING;
Case No. 4:15-CR-6049-EJS - 4

RICHARD J. TROBERMAN, P.S.
ATTORNEY AT LAW
520 PIKE STREET, SUITE 2500
SEATTLE, WASHINGTON 98101-1385
(206) 343-1111